

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 19-96 WMW/HB

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 1470

v.

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(b)(1)

18 U.S.C. § 2260A

TRAVIS KYLE MAYER,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Distribution of Child Pornography)

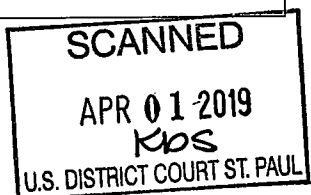
On or about August 8, 2018, in the State and District of Minnesota, the
defendant,

TRAVIS KYLE MAYER,

having been convicted previously in 2012 under the laws of the State of Minnesota of
Criminal Sexual Conduct in the Third Degree (Minn. Stat.
§ 609.344, subd. 1(b)), knowingly distributed two visual depictions of MINOR A using
a means and facility of interstate and foreign commerce that had been mailed,
shipped, and transported in and affecting interstate and foreign commerce, by any
means including by cellular telephone—that is, the Kik messenger application—with
the following file names:

64be51ab2efbbc88f480f0de4e34102d

dcfb0a52668fcdcf68812ef02e7f30c0



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where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 2
(Transfer of Obscene Matter to a Minor)

Between June 26, 2018 and July 17, 2018, in the State and District of Minnesota, the defendant,

TRAVIS KYLE MAYER,

knowingly transferred obscene matter to MINOR A, an individual known to the defendant to be under the age of sixteen, using a means and facility of interstate and foreign commerce, by any means including by cellular telephone—that is, the Kik messenger application—with the following file names:

298c8a80-5463-490a-91ca-007da72f8df0.0
d6f96d84-3256-4cc3-b001-e2579603c7e1.0

all in violation of Title 18, United States Code, Section 1470.

COUNT 3
(Penalties for Registered Sex Offenders)

Between June 26, 2018 and July 17, 2018, in the State and District of Minnesota, the defendant,

TRAVIS KYLE MAYER,

an individual required by Minnesota law to register as a sex offender at all times relevant to this indictment committed felony offenses involving MINOR A, as charged in Count 2, all in violation of Title 18, United States Code, Section 2260A.

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FORFEITURE ALLEGATIONS

Counts 1 and 2 are incorporated for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 1467 and 2253(a). Upon conviction of Count 1 of this Indictment, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

1. any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18, United States Code;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property. If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

Upon conviction of Count 2 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1467, any interest in:

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1. any obscene material produced, transported, mailed, shipped, or received, in violation of Title 18, United States Code, Chapter 17;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

The property subject to forfeiture upon conviction of either Count 1 or Count 2 of this Indictment includes, but is not limited to:

- a. one black ZTE cell phone (model Z899VL) with serial number 32F483808920; and
- b. one black ZTE cell phone (model Z799VL) with serial number 329F74895F59.

If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 1467(b) and 2253(b).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON